

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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JEWEL RANKIN, individually on behalf	:
of and all others similarly situated,	:
	:
Plaintiff,	:
	:
-against-	:
	:
ARCA CONTINENTAL S.A.B. DE	:
C.V., (D/B/A ARCA CONTINENTAL)	:
AND OLD LYME GOURMET COMPANY	:
(D/B/A DEEP RIVER SNACKS),	:
	:
Defendants.	:
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Case No. 1:20-cv-01756-RRM-PK

**JOINT STATUS REPORT**

Plaintiff Jewel Rankin (“Plaintiff”) and Defendant Old Lyme Gourmet Company (“Old Lyme” or “Defendant”), through their undersigned counsel, submit the following Joint Status Report on the progress of the limited discovery in this case as required by the Court’s minute Order of May 4, 2021.

**Parties’ Joint Update on Discovery Status**

The following represents activity that has occurred since the last status report to this Court on December 4, 2020 (ECF No. 20):

1. The parties held a meet and confer on December 8, 2020. During the meet and confer, Old Lyme requested from Plaintiff an update on the outstanding items detailed in Old Lyme’s deficiency letters to Plaintiff dated October 12, 31 and December 3, 2020. Plaintiff’s counsel indicated that they would look into outstanding items from that correspondence, and confirm whether Plaintiff was in possession of any responsive documents. Old Lyme agreed to continue its rolling productions.
2. On April 26, 2021, Old Lyme made its third production of documents to Plaintiff. Old Lyme continues to search for and produce responsive documents.

3. In the cover e-mail transmitting its April 26, 2021 production, Old Lyme again inquired about Plaintiff's response to the outstanding items detailed in Old Lyme's deficiency letters dated October 12, 31, and December 3, 2020, and asked Plaintiff's counsel to provide a timeframe in which Plaintiff will be producing documents.
4. As of the date of this submission, Old Lyme has not received a response from Plaintiff's counsel with respect to the outstanding items detailed in Old Lyme's deficiency letters dated October 12, 31, and December 3, 2020, and Plaintiff has not produced any documents.
5. Although Plaintiff has not yet cured these deficiencies or produced documents, the parties are attempting to resolve these discovery issues without burdening the Court.
6. Old Lyme states that, although the backdrop of the global pandemic continues to present challenges in locating and gathering potentially responsive materials, it has been diligently searching for, collecting, and reviewing potentially relevant ESI and will continue to produce responsive documents on a rolling basis until its production is complete.

Dated: New York, New York  
May 7, 2021

By: /s/ Michael R. Reese  
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*Attorneys for Defendant  
Old Lyme Gourmet Company*

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing Joint Status Report have been electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record, on this 7th day of May, 2021.

Dated: New York, New York  
May 7, 2021

By: /s/ Meghana D. Shah  
Meghana D. Shah